

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
IONUT IAMANDITA	:	VIOLATIONS:
a/k/a “Ionu Chiciu,”	:	18 U.S.C. § 1349 (conspiracy to
a/k/a “Iona Chiciu,”	:	commit bank fraud – 1 count)
MILENA IAMANDITA	:	18 U.S.C. § 1028A (aggravated
MARIUS IORDACHE,	:	identity theft – 1 count)
a/k/a “Marius Serdaru”		Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Citadel Credit Union (“CCU”) was a credit union whose accounts were insured by the National Credit Union Administration.
2. CCU was headquartered in Exton, Pennsylvania, and had branches in Bucks County, Chester County, Delaware County, Lancaster County, and Montgomery County, Pennsylvania, all within the Eastern District of Pennsylvania.
3. CCU had automated teller machines (“ATMs”) at multiple locations throughout the Eastern District of Pennsylvania. ATMs allowed customers to withdraw cash from their accounts using cards issued by their financial institution (“Bank Cards”) along with corresponding personal identification numbers (“PINs”).

4. “Skimming Devices” were equipment that records the information contained on Bank Cards each time bank customers inserted their cards into the ATM. That information included cardholder data.

THE SCHEME TO DEFRAUD

5. From on or about December 9, 2022 through on or about January 19, 2023, within the Eastern District of Pennsylvania and elsewhere, defendants

**IONUT IAMANDITA,
a/k/a “Ionu Chiciu,”
a/k/a “Iona Chiciu,”
MILENA IAMANDITA, and
MARIUS IORDACHE,
a/k/a “Marius Serdaru,”**

together with others known and unknown to the United States Attorney, conspired and agreed to commit bank fraud, in violation of Title 18, United States code, Section 1344.

MANNER AND MEANS

It was part of the conspiracy that:

6. Defendants IONUT IAMANDITA, MILENA IMANDITA, and MARIUS IORDACHE, together with others known and unknown to the United States Attorney, participated in a fraud syndicate that used Skimming Devices to steal CCU customers’ account information and withdraw funds from CCU ATMs and other ATMs using the stolen account information.

7. Defendant MARIUS IORDACHE and others surreptitiously placed, repaired, and removed, or assisted in placing, repairing, or removing Skimming Devices and covert video recorders on certain CCU ATMs. The Skimming Devices captured information associated with CCU members’ Bank Cards and the covert video recorders captured CCU

members' PINs. The Skimming Devices were placed, repaired, and removed, on, among others, the following occasions:

	Location	Date	Time (approx.)	Defendant(s) Present
a	1246 Cornerstone Boulevard, Downingtown, PA	December 9, 2022	7:26 a.m. EST	MARIUS IORDACHE
b	40 North Bailey Road, Thorndale, PA	December 9, 2022	7:38 a.m. EST	MARIUS IORDACHE
c	40 North Bailey Road, Thorndale, PA	December 10, 2022	12:03 a.m. EST	MARIUS IORDACHE
d	901 Baltimore Pike, Glen Mills, PA	December 11, 2022	8:52 p.m. EST	MARIUS IORDACHE
e	40 North Bailey Road, Thorndale, PA	December 14, 2022	8:36 p.m. EST	MARIUS IORDACHE
f	40 North Bailey Road, Thorndale, PA	December 17, 2022	11:05 p.m. EST	MARIUS IORDACHE
g	40 North Bailey Road, Thorndale, PA	December 18, 2022	9:01 p.m. EST	MARIUS IORDACHE
h	40 North Bailey Road, Thorndale, PA	December 28, 2022	10:44 p.m. EST	MARIUS IORDACHE
i	901 Baltimore Pike, Glen Mills, PA	December 28, 2022	11:14 p.m. EST	MARIUS IORDACHE
j	105 Commons Drive, Oxford, PA	January 4, 2023	9:25 p.m. EST	MARIUS IORDACHE
k	842 East Baltimore Pike, Kennett Square, PA	January 4, 2023	9:48 p.m. EST	MARIUS IORDACHE
l	1246 Cornerstone Boulevard, Downingtown, PA	January 4, 2023	10:29 p.m. EST	MARIUS IORDACHE
m	1246 Cornerstone Boulevard, Downingtown, PA	January 5, 2023	9:14 p.m. EST	MARIUS IORDACHE
n	842 East Baltimore Pike, Kennett Square, PA	January 5, 2023	9:50 p.m. EST	MARIUS IORDACHE

	Location	Date	Time (approx.)	Defendant(s) Present
o	105 Commons Drive, Oxford, PA	January 6, 2023	7:24 p.m. EST	MARIUS IORDACHE
p	842 East Baltimore Pike, Kennett Square, PA	January 6, 2023	8:06 p.m. EST	MARIUS IORDACHE
q	842 East Baltimore Pike, Kennett Square, PA	January 7, 2023	7:41 p.m. EST	MARIUS IORDACHE
r	105 Commons Drive, Oxford, PA	January 7, 2023	8:10 p.m. EST	MARIUS IORDACHE

8. From on or about January 14, 2023, through on or about January 19, 2023, defendants IONUT IAMANDITA, MILENA IAMANDITA, MARIUS IORDACHE, and others used plastic cards with the encoded stolen information, which functioned as cloned Bank Cards, to make unauthorized cash withdrawals at CCU ATMs and other ATMs from the bank accounts that corresponded to the account information encoded on the card. Withdrawals were made on, among others, the following occasions:

	Location	Date	Time (approx.)	Defendant(s) Present
a	4051 West Lincoln Hwy Parkesburg PA	January 14, 2023	2:15 p.m. – 2:15 p.m. EST	MARIUS IORDACHE
b	901 Baltimore Pike, Glen Mills, PA	January 14, 2023	2:24 p.m. – 2:42 p.m. EST	IONUT IAMANDITA and MILENA IAMANDITA
c	40 North Bailey Road, Thorndale, PA	January 14, 2023	2:49 p.m. – 2:52 p.m. EST	MARIUS IORDACHE
d	4923 Edgemont Ave, Brookhaven, PA	January 14, 2023	3:07 p.m. EST	IONUT IAMANDITA and MILENA IAMANDITA
e	2560 West Ridge Pike, West Norriton, PA	January 14, 2023	4:50 p.m. – 5:01 p.m. EST	IONUT IAMANDITA
f	75 W Germantown Pike, East Norriton, PA	January 14, 2023	5:13 p.m. – 5:35 p.m. EST	IONUT IAMANDITA
g	255 Harleysville Pike, Harleysville PA	January 14, 2023	7:30 p.m. – 7:54 p.m. EST	IONUT IAMANDITA

	Location	Date	Time (approx.)	Defendant(s) Present
h	901 Baltimore Pike, Glen Mills, PA	January 14, 2023	10:44 p.m. – 10:47 p.m. EST	IONUT IAMANDITA
i	901 Baltimore Pike, Glen Mills, PA	January 15, 2023	6:50 a.m. – 6:58 a.m. EST	IONUT IAMANDITA
j	943 Sproul Road, Springfield, PA	January 15, 2023	8:16 a.m. EST	IONUT IAMANDITA and MILENA IAMANDITA
k	4051 West Lincoln Highway, Parkesburg, PA	January 16, 2023	7:48 a.m. EST	IONUT IAMANDITA
l	Target, 201 Sunrise Boulevard, Exton, PA	January 16, 2023	11:27 a.m. – 11:31 a.m. EST	MILENA IAMANDITA

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 14, 2023, in the Eastern District of Pennsylvania, defendant

**MARIUS IORDACHE,
a/k/a “Marius Serdaru”**

knowingly and without lawful authority, possessed and used a means of identification of another person, C.K., that is, a CCU Bank Card ending with digits 6958 and PIN, during and in relation to bank fraud, a felony violation of Title 18, United States Code, Section 1344, as charged in Count One, knowing that the means of identification belonged to a customer of CCU.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1349, set forth in this information, defendants

**IONUT IAMANDITA,
a/k/a “Ionu Chiciu,”
a/k/a “Iona Chiciu,”
MILENA IAMANDITA, and
MARIUS IORDACHE,
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shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such violations including, but not limited to, the sum of \$938,887.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A handwritten signature in blue ink, appearing to read "Christine C. Romero", is positioned above a horizontal line.

JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

Criminal No.

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

IONUT IAMANDITA a/k/a “Ionu Chiciu, a/k/a Iona Chiciu”
MILENA IAMANDITA AND MARIUS IORDACHE
a/k/a “Marius Serdaru”

INFORMATION

Counts

18 U.S.C. § 1349 (conspiracy to commit bank fraud - 1 count)
18 U.S.C. § 1028A (aggravated identity theft - 1 count)
Notice of forfeiture

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Foreperson

Bail, \$ _____
